

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
ONE MANHATTAN WEST  
NEW YORK, NY 10001

**MEMO ENDORSED**

DIRECT DIAL  
212-735-2995  
DIRECT FAX  
917-777-2995  
EMAIL ADDRESS  
JOCELYN.STRAUBER@SKADDEN.COM

TEL: (212) 735-3000  
FAX: (212) 735-2000  
WWW.SKADDEN.COM

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September 2, 2021

**BY ECF**

The Honorable Valerie E. Caproni  
United States District Judge  
U.S. District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Velez*, 19 Cr. 862 (Deeshuntee Stevens)**

Dear Judge Caproni:

I write on behalf of my client, Deeshuntee Stevens, to respectfully request permission for Mr. Stevens to travel from Rochester, NY, to New York City, on September 3, to spend Labor Day weekend with his daughters. If granted permission, Mr. Stevens would travel by bus to and from New York City, leaving Rochester in the evening of September 3 and arriving in New York City in the early morning hours of September 4. He would spend the night of September 4 at a hotel in the Bronx near the home of Melissa Blondet, one of the co-signors for Mr. Stevens' bond and the mother of Mr. Stevens' two youngest daughters. He would then return to Rochester from New York City on the night of September 5.

Mr. Stevens would spend the days of September 4 and 5 at the home of Ms. Blondet and at a park nearby her home for a barbeque. In addition to Mr. Stevens, there will be five attendees at the gathering at Ms. Blondet's residence and the park, all of whom reside in the same household and are fully vaccinated and/or at low risk for severe COVID-19 disease, including: Mr. Stevens' two daughters, who are thirteen and eight years old; Ms. Blondet, with whom Mr. Stevens maintains a

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close relationship; and Ms. Blondet's two other children, a nineteen-year-old daughter and a two-year-old son.

Both the gathering at Ms. Blondet's home and at the nearby park are consistent with New York State's rules with respect to gatherings at private residences and small gatherings in outdoor settings.<sup>1</sup> As well, as Mr. Stevens is fully vaccinated, his participation in these gatherings would be consistent with current CDC guidelines, which permit fully vaccinated people to "resume activities that [they] did prior to the pandemic."<sup>2</sup>

The office of Pretrial Services has informed us that it opposes Mr. Stevens' request, noting that Pretrial Services "opposes social leave requests as well as overnight requests for defendants subject to home detention." We recently informed the United States Attorney's Office of Mr. Stevens' request and have not yet received a response.

As the Court is aware, on June 10, 2021, Mr. Stevens pled guilty before your Honor to conspiring to distribute heroin and fentanyl in violation of 21 U.S.C. §§ 841(b)(1)(B) and 846. Your Honor permitted Mr. Stevens to remain on bail on the same conditions of release initially imposed on August 21, 2020. Those conditions include: (1) a \$100,000 personal recognizance bond, signed by Mr. Stevens and co-signed by three financially responsible persons; (2) home detention with electronic monitoring, except to attend work, to seek employment (with agreement of the office of Pretrial Services as to the specifics), and for medical visits and legal visits, at the Rochester, New York home of Jesseivett Orta, a close family friend serving as third-party custodian; and (3) travel restricted to the state of New York.

As the Court is also aware, Mr. Stevens has traveled to New York City with the Court's permission for family events and legal visits several times

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<sup>1</sup> "Governor Andrew M. Cuomo today announced that COVID-19 restrictions are lifted immediately as 70 percent of New Yorkers aged 18 or older have received the first dose of their COVID-19 vaccination series." New York State, *Governor Cuomo Announces COVID-19 Restrictions Lifted as 70% of Adult New Yorkers Have Received First Dose of COVID-19 Vaccine*, <https://www.governor.ny.gov/news/governor-cuomo-announces-covid-19-restrictions-lifted-70-adult-new-yorkers-have-received-first> (last updated Jun. 15, 2021).

<sup>2</sup> Centers for Disease Control and Prevention, *Interim Public Health Recommendations for Fully Vaccinated People*, <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated.html> (last updated Aug. 19, 2021).

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since he entered his guilty plea and on several prior occasions. Those trips were without incident.

Respectfully submitted,

s/ Jocelyn E. Strauber

cc: Assistant U.S. Attorney Adam S. Hobson  
Assistant U.S. Attorney Elinor L. Tarlow  
U.S. Pretrial Services Officer Jonathan Lettieri  
U.S. Pretrial Services Officer Jeremy Bedette

Application GRANTED.

SO ORDERED.



Date: September 3, 2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE